

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case No. 21-cr-20401

Honorable David M. Lawson

vs.

Nikolas Boris Mariani,

Defendant.

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**First Forfeiture Bill of Particulars**

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The United States, by and through its counsel, submits this First Forfeiture Bill of Particulars, pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure to supplement and clarify the forfeiture allegations contained in the Indictment and to provide notice of specific property the government intends to forfeit upon conviction.

The allegations set forth in the Indictment are re-alleged and incorporated herein by this reference for the purpose of alleging forfeiture pursuant to Federal Rule of Criminal Procedure 32.2(a) and 18 U.S.C. § 2253. As a result of violating the offenses set forth in Count One or Count Two of the Indictment, Nikolas Boris

Mariani shall, pursuant to 18 U.S.C. § 2253, forfeit the following to the United States:

- i. Any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of these subsections;
- ii. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property; and
- iii. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property;

which includes, but is not limited to the following:

- Miscellaneous Cell Phones, including the following:
  - LG LM-Q730QM cell phone, Serial No.: N/A; and
  - Samsung cellular telephone, Serial No.: N/A;
- Samsung Galaxy S20 Ultra 5G, Serial No.: N/A;
- Miscellaneous Cell Phones, including the following:
  - Blue Samsung cellular telephone with cracked glass encasing, Serial No.: N/A; and
  - Samsung Galaxy S10+, Model No. SM-G975U, Serial No.: N/A.

This notice does not limit the government from seeking the forfeiture of additional specific property, including substitute assets, or limit the government from seeking the imposition of a forfeiture money judgment.

Respectfully submitted,

Dawn N. Ison  
United States Attorney

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Dated: June 14, 2022

**Certification of Service**

I hereby certify that on June 14, 2022, the foregoing document was electronically filed using the ECF system which will send notification of such filing to all ECF participants.

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